

FILED

OCT 03 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

Defendant.

CRIMINAL NO.

17-cr-30158-SMY

Title 18, United States Code, Sections
2, 152(3), 157, and 1519

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. At times material to this indictment:

a. Chapter 7 of the United States Bankruptcy Code (Title 11 of the United States Code) provided persons (debtors) with an opportunity to obtain a fresh financial start through the elimination of their debts.

b. The Bankruptcy Code required that a debtor file under penalty of perjury with the Bankruptcy Court a petition, supporting schedules, and a statement of financial affairs disclosing, among other things, the debtor's property, transfers of property, income, creditors, and debts.

c. Bankruptcy Petition Preparers were persons, other than attorneys and their employees, who prepared documents for filing in bankruptcy cases and who were compensated for those services.

d. The Bankruptcy Code required Bankruptcy Petition Preparers to sign, and print their names and addresses on, all documents they prepared for filing in bankruptcy cases.

e. The Bankruptcy Code further required persons working as Bankruptcy Petition Preparers to place their social security numbers on all documents they prepared for filing in bankruptcy cases.

f. The Bankruptcy Code further required all Bankruptcy Petition Preparers to disclose on any bankruptcy petition they prepared all fees they had received from the debtors within 12 months prior to the filing of the petition, and any unpaid fees charged to the debtors.

g. The United States Bankruptcy Courts were permitted to establish maximum allowable fees that could be charged by Bankruptcy Petition Preparers.

h. The Bankruptcy Code directed the United States Bankruptcy Courts to disallow and order the immediate turnover of any fees charged by Bankruptcy Petition Preparers that exceeded the maximum allowable fee rate.

i. After a chapter 7 bankruptcy petition was filed, the Bankruptcy Code required debtors to participate in a Meeting of Creditors. At these Meetings of Creditors, creditors, attorneys for creditors, the chapter 7 trustee, and attorneys of the United States Trustee's Office were permitted to ask debtors questions, under oath, about their financial affairs and assets.

2. At times material to this indictment the custom and practice in the United States Bankruptcy Court for the Southern District of Illinois was that the maximum allowable fee per case that could be charged by a Bankruptcy Petition Preparer was \$150.

3. At times material to this indictment:

a. Defendant PHEBE IBRAHIM, formerly known as "Phebe Khan," (IBRAHIM) functioned as a Bankruptcy Petition Preparer.

b. IBRAHIM prepared bankruptcy petitions and other documents for debtors who filed cases in the United States Bankruptcy Court for the Southern District of Illinois.

c. IBRAHIM was not a licensed attorney.

4. From at least June 2011, through at least August 2, 2016, in St. Clair County, within the Southern District of Illinois, and elsewhere,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

defendant herein, knowingly devised a scheme to defraud the debtors for whom she prepared bankruptcy petitions for filing in the United States Bankruptcy Court for the Southern District of Illinois.

5. It was the object of the scheme that IBRAHIM profited by charging the debtors for fees that exceeded the maximum allowable amount of fees that could be charged by Bankruptcy Petition Preparers in the Southern District of Illinois.

6. IBRAHIM prepared approximately 120 petitions for debtors to file in the United States Bankruptcy Court for the Southern District of Illinois.

7. IBRAHIM charged the debtors fees of \$250, which, as IBRAHIM well knew, exceeded the maximum allowable fees that could be charged by Bankruptcy Petition Preparers in the Southern District of Illinois.

8. IBRAHIM concealed from both the debtors and the United States Bankruptcy Court for the Southern District of Illinois the fact that she was charging fees that exceeded the maximum allowable amount.

9. On each of the bankruptcy petitions she prepared, in response to a question on the forms that asked: "Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?", IBRAHIM falsely answered: "No."

10. Immediately after the question that asked "Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?", the petition forms contained a line that asked for the "Name of Person" who filled out the forms. The forms also instructed the filer to

“Attach Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119).”

On each of the bankruptcy petitions she prepared for debtors in the Southern District of Illinois, IBRAHIM left this line blank and did not attach an Official Form 119.

11. Prior to the Meetings of Creditors, IBRAHIM gave instructions to the Southern Illinois debtors regarding what to say. IBRAHIM told these debtors not to mention her name and not to say that someone had helped them prepare their petition and other documents.

12. By concealing her involvement as a Bankruptcy Petition Preparer, IBRAHIM prevented the Bankruptcy Court, the chapter 7 trustee, and the United States Trustee’s Office from discovering that she was charging the debtors fees exceeded the maximum allowable fees that could be charged by Bankruptcy Petition Preparers in the Southern District of Illinois.

13. On or about January 19, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials R.B., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped R.B. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 2

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about January 19, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with the initials R.B. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled “Application to Have the Chapter 7 Filing Fee Waived,” Official Form 103B, in response to question 17 which asked “Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?”, IBRAHIM caused the answer provided to be “No” and caused the follow-up section for the question “Whom did you pay?” to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 3

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. At times material to this indictment:

a. Within 180 days prior to filing a bankruptcy petition, debtors were required to receive a briefing from an approved non-profit budget and credit counseling agency which outlined opportunities for available credit counseling and assisted the debtor in performing a budget analysis.

b. Upon completion of the briefings, the credit counseling agencies issued to the debtors certificates verifying the completion of the briefings.

c. The certificates were filed with the Bankruptcy Court.

2. On or about January 19, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

defendant herein, knowingly caused to be falsified a document entitled "Certificate of Counseling," with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials R.B. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 4
(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.

2. On or about April 15, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials S.R., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question "Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?", the answer provided was "No," and which petition did not provide IBRAHIM's name as the person who helped S.R. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 5

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 15, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with the initials S.R. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled “Application to Have the Chapter 7 Filing Fee Waived,” Official Form 103B, in response to question 17 which asked “Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?”, IBRAHIM caused the answer provided to be “No” and caused the follow-up section for the question “Whom did you pay?” to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 6

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 15, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly caused to be falsified a document entitled “Certificate of Counseling,” with the intent to impede, obstruct, and influence the proper administration of a case

under Title 11, namely the bankruptcy case of a debtor with the initials S.R. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 7
(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.
2. On or about April 21, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials J.R., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped J.R. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 8
(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 21, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with the initials J.R. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled "Application to Have the Chapter 7 Filing Fee Waived," Official Form 103B, in response to question 17 which asked "Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?", IBRAHIM caused the answer provided to be "No" and caused the follow-up section for the question "Whom did you pay?" to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 9

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 21, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

defendant herein, knowingly caused to be falsified a document entitled "Certificate of Counseling," with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials J.R. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 10

(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.
2. On or about April 25, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials J.G., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped J.G. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 11

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 25, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with

the initials J.G. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled "Application to Have the Chapter 7 Filing Fee Waived," Official Form 103B, in response to question 17 which asked "Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?", IBRAHIM caused the answer provided to be "No" and caused the follow-up section for the question "Whom did you pay?" to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 12

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 25, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"

defendant herein, knowingly caused to be falsified a document entitled "Certificate of Counseling," with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials J.G. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 13

(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.
2. On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials M.H., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped M.H. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 14

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with

the initials M.H. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled “Application to Have the Chapter 7 Filing Fee Waived,” Official Form 103B, in response to question 17 which asked “Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?”, IBRAHIM caused the answer provided to be “No” and caused the follow-up section for the question “Whom did you pay?” to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 15

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly caused to be falsified a document entitled “Certificate of Counseling,” with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials M.H. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 16

(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.
2. On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials T.L., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped T.L. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 17

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with

the initials T.L. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled “Application to Have the Chapter 7 Filing Fee Waived,” Official Form 103B, in response to question 17 which asked “Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?”, IBRAHIM caused the answer provided to be “No” and caused the follow-up section for the question “Whom did you pay?” to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 18

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 27, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly caused to be falsified a document entitled “Certificate of Counseling,” with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials T.L. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

COUNT 19

(Bankruptcy Fraud – 18 U.S.C. §§ 2 & 157(1))

1. Paragraphs 1 through 12 of Count One of this indictment are realleged here.
2. On or about April 29, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, for the purpose of executing and concealing her scheme and artifice to defraud, knowingly caused to be filed with the United States Bankruptcy Court for the Southern District of Illinois, on behalf of a debtor with the initials T.R.M., a chapter 7 Voluntary Petition for Individuals Filing for Bankruptcy, which petition contained false information, in that:

In response to the question “Did you pay or agree to pay someone who is not an attorney to fill out your bankruptcy forms?”, the answer provided was “No,” and which petition did not provide IBRAHIM’s name as the person who helped T.R.M. fill out the bankruptcy forms, and which did not attach a Bankruptcy Petition Preparer’s Notice, Declaration, and Signature (Official Form 119);

In violation of Title 18, United States Code, Sections 2 and 157(1).

COUNT 20

(False Statement Under Penalty of Perjury in Bankruptcy Case – 18 U.S.C. §§ 2 & 152(3))

On or about April 29, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as “Phebe Khan,”

defendant herein, knowingly and fraudulently caused to be made a materially false declaration, certificate, verification, and statement under penalty of perjury, as permitted under section 1746 of Title 28, in and in relation to a case under Title 11, namely the bankruptcy case of a debtor with the initials T.R.M. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division, in that:

In a document filed with the Bankruptcy Court entitled "Application to Have the Chapter 7 Filing Fee Waived," Official Form 103B, in response to question 17 which asked "Have you paid anyone for services for this case, including filling out this application, the bankruptcy filing package, or the schedules?", IBRAHIM caused the answer provided to be "No" and caused the follow-up section for the question "Whom did you pay?" to be left blank;

In violation of Title 18, United States Code, Section 152(3).

COUNT 21

(Falsification of Records in Bankruptcy Case – 18 U.S.C. §§ 2 & 1519)

1. Paragraph 1 of Count Three of this indictment is realleged here.
2. On or about April 29, 2016, at St. Clair County, within the Southern District of Illinois,

PHEBE IBRAHIM,
formerly known as "Phebe Khan,"


defendant herein, knowingly caused to be falsified a document entitled "Certificate of Counseling," with the intent to impede, obstruct, and influence the proper administration of a case under Title 11, namely the bankruptcy case of a debtor with the initials T.R.M. in the United States Bankruptcy Court, Southern District of Illinois, East St. Louis Division;

In violation of Title 18, United States Code, Sections 2 and 1519.

~~ATTORNEY~~

FOREPERSON


SCOTT A. VERSEMAN
Assistant United States Attorney


DONALD S. BOYCE
United States Attorney

Recommended Bond: \$10,000 Unsecured